

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Chapter 13  
Keer, Timothy John  
Keer, Clara M.  
Debtors : 16-10933 jkf

: Hearing Date, Time and Place:

Date: September 21, 2016  
Time: 9:30 AM  
United States Bankruptcy Court  
900 Market Street  
Philadelphia, PA 19107  
Court Room #3

**NOTICE MOTION, RESPONSE DEADLINE AND HEARING DATE**

The above-named debtors filed a motion with the court to avoid the lien of **Unifund CCR LLC**, the respondent.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

**1. If you do not want the court to grant relief sought in the motion or if you want the court to consider your views on the motion, then on or before September 6, 2016, you or your attorney must do all the following:**

(a) file answer explaining your position at

U.S. Bankruptcy Court, Clerk's Office  
Robert C. Nix Building  
900 Market Street  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

John L. McClain, Esquire  
John L. McClain & Associates, P.C.  
P.O. Box 123  
Narberth, PA 19072  
Telephone: (215) 893-9357

Fax No.: (888) 857-1967

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting relief requested in the motion.

**3. A hearing on the motion is scheduled to be held before the Honorable Jean K. FitzSimon on September 21, 2016 @ 9:30 AM in Courtroom 3, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107.**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215)408-2800 to find out whether the hearing has been canceled because no one filed an answer.

DATE: August 23, 2016